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Attorneys for Plaintiff Orange County Coastkeeper

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ORANGE COUNTY
COASTKEEPER, a California non-
profit corporation,

v.
Plaintiff,

CERTIFIED AUTO SALVAGE;
RON STEVENS; JUDY WISLOCKI,
Defendants.

Case No. 8:22-cv-02044-FWS-JDE

REQUEST FOR ENTRY OF CONSENT DECREE

Honorable Fred W. Slaughter

On April 3, 2023, Plaintiff Orange County Coastkeeper sent a letter to the United States Department of Justice and the United States Environmental Protection Agency to trigger a mandatory 45-day review period to review the [Proposed]

1 Consent Decree entered into by the parties on March 30, 2023. *See* 33 U.S.C. §
2 1365(c); 40 C.F.R. § 135.5. On May 4, 2023, the Department of Justice sent the
3 parties a letter indicating that the federal agencies had no objection to entry of the
4 [Proposed] Consent Decree. That letter is attached hereto as Exhibit 1. Accordingly,
5 the Parties hereby respectfully request that the Court enter the [Proposed] Consent
6 Decree filed with the Court contemporaneously with this request.
7

8 Respectfully submitted,

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10 Dated: May 8, 2023

LOZEAU DRURY LLP

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12 /s/ Douglas J. Chermak

Douglas J. Chermak

13
14 *Attorneys for Plaintiff ORANGE COUNTY*
COASTKEEPER

15
16 Dated: May 8, 2023

GHASSEMIAN LAW GROUP, APC

17
18 /s/ Elaine Alston

(as authorized on 5/8/23)

19
20 Elaine Alston

Attorneys for Defendant CERTIFIED AUTO
SALVAGE

21
22 Dated: May 8, 2023

ENVIRONMENTAL LAW GROUP LLP

23
24 /s/ Josh Rosenbaum

(as authorized on 5/8/23)

25
26 Josh Rosenbaum

Attorneys for Defendants RON STEVENS and
JUDY WISLOCKI

